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January 25, 2018

Via ECF/CM

The Honorable Edgardo Ramos
United States District Court
for the Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. El Gammal*, 15-cr-588 (S.D.N.Y.) (ER)

Dear Judge Ramos:

I, along with Donald Duboulay, represent Mr. Ahmed El Gammal, having been appointed to represent him pursuant to the Criminal Justice Act, 18 U.S.C. § 3006A. Mr. Gammal is currently scheduled to be sentenced on March 22, 2018. The defense team is in the process of investigating various factors relevant to the 18 U.S.C. § 3553(a) sentencing considerations. To be able to do so adequately, however, we will need additional time and anticipate that to obtain and analyze the relevant information requires a further 90 days. This is the first request for a sentencing adjournment. The government consents to the request.

Additionally, I have spoken with the United States Probation Officer assigned to conduct the Presentence Investigation Report interview about this request, and have assured him that we will be available for an interview with Mr. Gammal that will allow the draft PSI Report to be prepared with time for the parties to lodge any objections prior to its submission to the Court. To ensure that all information is available to the Probation Officer at the time of his interview, and because we do not yet have that relevant information, we ask that under the individual circumstances of this case the Court grant a variance from the deadlines for preparation of the PSI Report as set forth in the Amended Standing Order docketed at 14-mc-141, allowing the parties to provide their input to the PSI Report such that the final version will be available to the Court at least 14 days prior to the sentencing, but otherwise relieving the Probation Officer of the completion dates in the Amended Standing Order.

For the reasons set forth above, we ask that this Court adjourn the current sentencing until a date after June 25, 2018, and vary the deadlines for the PSI Report as noted above.

Respectfully submitted,

/s/ Megan W. Benett

cc: All counsel of record via ECF/CM

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